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UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF TEXAS  
WICHITA FALLS DIVISION

In Re:	§	
Kenneth Dean Samples	§	Case No. 10-70031-13
	§	Chapter 13
Debtor	§	

DEBTOR'S MOTION TO EXTEND AUTOMATIC STAY

Comes Now Debtor, by counsel, and for this Motion state as follows:

1. Debtor filed for relief under Chapter 13 in the Northern District of Texas. This is a core proceeding.
2. Debtor was a debtor in a prior case during the preceding year. To-wit: Chapter 13, Case No. 05-71139-HDH-13 filed on 10/14/2005.
3. Debtor seeks an extension of the automatic stay imposed for 30-days pursuant to 11 U.S.C. §362(c)(3)(A), as to all creditors until further order or discharge to effectuate an orderly reorganization, pursuant to 11 U.S.C. §362(c)(3)(B).
4. Debtor's prior case was dismissed for: Loss of income. Debtor's employer reduced hours allowed to work weekly and no overtime.
5. The following changes of circumstances demonstrate that the Debtor can perform this plan and are likely to complete the case successfully: Debtor's new plan payment was lowered and the payment will be deducted from his weekly pay check.

WHEREFORE, Debtor requests this Court enter its order continuing the automatic stay under §362(a) in this proceeding as to all creditors for the duration of this Chapter 13 proceeding, or until such time as the stay is terminated under §362(c)(1) or (c)(2) or a motion for relief is granted under §362(d).

Respectfully submitted,  
/s/Monte J. White  
Attorney for Debtor

CERTIFICATE OF SERVICE

A true and exact copy of the foregoing Motion and Notice of Hearing was served electronically by the ECF System or by First Class Mail on January 28, 2010 on all parties on the mailing matrix:

/s/Monte J. White  
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